

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Kohchise Jackson,

Plaintiff,

v.

Case No: 2:19-cv-13382

District Judge: Terrence G. Berg

Magistrate Judge: Patricia T. Morris

Corizon Health, Inc., et al.

Defendants.

MARGOLIS, GALLAGHER & CROSS

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CHAPMAN LAW GROUP

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**DEFENDANTS CORIZON HEALTH, INC. AND KEITH PAPENDICK,
M.D.'S PRELIMINARY WITNESS LIST**

NOW COME Defendants CORIZON HEALTH, INC. and KEITH PAPENDICK, M.D., by and through their counsel, CHAPMAN LAW GROUP, and for their PRELIMINARY WITNESS LIST, state as follows:

1. Plaintiff Kohchise Jackson

Contact information: c/o counsel for Plaintiff

2. Colleen Marie Spencer

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3. David A. Kraus, D.O.

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24.Mason Gill (Corizon)

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25. Karen Mason, RN, CCHP

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26. Steven Bergman, D.O.

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30. Rickey Coleman, D.O.

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31. Whitney Thompkins – Analyst Assistant

Contact information: c/o Office of Legislative Corrections Ombudsman

32. Keith Barber – Ombudsman

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33. Erina Kansaker, M.D.

Contact information: c/o Lake Huron Medical Center, and/or Physicians Healthcare Network, and/or 4450 Fauntelroy Way, SW, Ste. 200, Seattle, WA 98126.

34. Thomas A. Coury, M.D.

Contact information: c/o Lake Huron Medical Center, and/or Physicians Healthcare Network.

35. Any other individuals identified during the course of discovery and in other parties' initial disclosures and/or witness lists.
36. Any other treating health care provider that Plaintiff may have seen before his incarceration.
37. Any other treating health care provider that Plaintiff may have seen after his incarceration.
38. Any other treating health care provider that Plaintiff may have seen after his incarceration, including those who evaluated and treated him for his colostomy or related conditions, and/or performed a colostomy reversal surgery on Plaintiff.
39. Any and all family members, friends, co-workers, neighbors, etc., of Plaintiff who have personal knowledge of the allegations contained within the filed materials in this matter.
40. Any and all individuals whose names are contained in the pleadings, depositions, or who have been named in any subpoenaed records.
41. To the extent that Plaintiff may have received Medicare benefits, pursuant to the Medicare Secondary Payor Act, Defendants reserve the right to obtain information pertaining to any and all Medicare benefit payments and to call as witnesses any and all persons who were reimbursed by Medicare for any treatment or service rendered to Plaintiff.
42. To the extent that Plaintiff may have received Medicaid benefits, including from Healthy Michigan Medicaid, Defendants reserve the right to obtain information pertaining to any and all Medicaid benefit payments and to call as witnesses any and all persons who were reimbursed by Medicaid for any treatment or service rendered to Plaintiff.
43. The keeper of records for MDOC institutional and other records related to Plaintiff's incarceration and any MDOC personnel listed in same records.
44. Any and all employees, agents, representatives, or custodian or records for Corizon, Inc.

45. Any and all employees, agents, representatives, or custodian or records for St. Clair County Correctional Facility.
46. Any and all employees, agents, representatives, or custodian or records for Prime Healthcare Services – Port Huron, LLC.
47. Any and all employees, agents, representatives, or custodian or records for Detroit Medical Center.
48. Any and all employees, agents, representatives or Corizon and MDOC who are involved in the procedures related to 407 requests, utilization reviews, and the appeal process of 407 requests.
49. Any and all employees, agents, representatives or custodian of data related to 407 requests, utilization reviews, and any other records kept by Corizon, Inc., and MDOC regarding the appeal process of 407 requests.
50. Any and all persons, employees, agent, or representatives who are responsible for implementing MDOC policies or procedures, including MDOC Policy Directive 03.04.100.
51. Any and all necessary rebuttal witnesses.
52. Any witnesses necessary to lay the foundation for the admission of tangible or documentary evidence.
53. Any and all individuals and/or entities identified through discovery.
54. Any and all witnesses (lay and expert) listed by Plaintiff, whether or not they are called to testify at trial.
55. Defendants reserve the right to elicit standard of practice, proximate cause, or other expert testimony from prior or subsequent qualified authority to render expert testimony.
56. Pursuant to Fed. R. Civ. P. 26(a)(2), Defendants will disclose their retained and non-retained expert witnesses in accordance with this Court's Scheduling Order and/or the Federal Rules of Civil Procedure. Defendants will also disclose the reports of their retained experts by the deadline set

forth in the Court's Scheduling Order and/or in accordance with the Federal Rules of Civil Procedure.

57. Defendants reserve the right to add additional lay and expert witnesses as discovery and/or investigation continue in this matter up until the time of trial.

58. Defendants reserve the right to supplement and/or amend this witness list.

Respectfully submitted,
CHAPMAN LAW GROUP

Dated: October 15, 2020

/s/Devlin Scarber
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PROOF OF SERVICE

I hereby certify that on October 15, 2020, I presented the foregoing paper to the Clerk of the Court for filing and uploading to the ECF system, which will send notification of such filing to the attorneys of record listed herein and I hereby certify that I have mailed by US Postal Service the document to the involved non participants.

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